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Before the
Federal Communications Commission
Washington, DC 20554

In the matter of

Amendment of Part 95 of the
Commission's Rules to Allow
Organizational Licensing
on GMRS

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REPLY COMMENTS ON A PETITION FOR RULEMAKING

Filed by: Lee W. Besing,
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San Antonio, TX 78218

30 July 1997

I am one of four elected Field Directors for REACT International, Inc., an organization of which you are most likely familiar. I have had a GMRS license for the past ten years, KAE-2449, and have been a licensed Amateur for the past eight years, N5NTG. Prior to that, I held a CB license since 1973. I am active in two local REACT Teams, our Texas State Council and local Amateur Radio Clubs here in San Antonio. I have been an active member of REACT since 1974, providing volunteer radio communications to the American Red Cross and my local community in times of need.

A large number of REACT Teams throughout the USA have been using GMRS radio systems for internal communications during disasters and public safety events. GMRS has allowed the teams to get the message through, without the individual having the requirement of passing the testing that the Amateur Radio Service requires. By having an affordable GMRS group license, teams were able to attract members from the community who could be handed a radio, or purchase their own radio, and be on the air within minutes of joining the team. With the removal of group licensing abilities, many new teams were forced to spend hundreds or even thousands of dollars to obtain individual GMRS licenses for their members. Other teams, unable to meet this financial requirement have chosen to not use GMRS and consequently their community has perhaps suffered from this lack.

CB Radio still plays an important part in REACT communications, but it does not meet the needs of providing reliable internal communications to coordinate during an emergency or public safety event. Amateur Radio, until relatively recently, had restrictions on usage which prevented it from being used to coordinate many public safety events. GMRS has been the choice solution to meet our community's needs nationwide by our member REACT Teams.

Mr. Moore, representing the PRSG, has long had a known, strong, publicly stated dislike of REACT and our presence on GMRS for many years. This statement is based upon my personal conversations I have had with Mr. Moore in the past. Therefore I would have to question his assertions unless he had provided hard data from his "research" to back his statements with confirmed facts.

In Mr. Moore's comments, he stated that he was worried about the potential for abuse by members of a group license holder. However, it has been my experience over the past 23 years, that most REACT Teams take the operation of their radios and radio nets very seriously. An infringement that threatens the group or the group license is often times dealt with locally and quickly by the group, to prevent problems being visited upon the group. A similar number of unrelated individuals would have no incentive to follow the rules or to cooperate with each other on the frequency. In cases where group licenses are issued to public service organizations there is a lower likelihood of rules violations, as each member of the organization has a stake in protecting the group's license, and in seeing that his or her fellow members also operate in accordance with Part 95A. The groups are then able to police themselves. By taking proper sanctions against violating members they are actually able to ease the enforcement burden placed on the Commission. This type of "self enforcement" has worked on other services, such as the Amateur Radio Service.

Indeed, because of this issue, REACT International' Training and Development Committee developed a comprehensive GMRS training course. To date, hundreds of registered REACT members have successfully completed this course, further supporting the idea that organizations like REACT will bring more legal operation to the radio service than similar numbers of unrelated individuals.

Mr. Collier and others who have supported this proposal, have stated most of the pertinent facts already, and I am in support of their comments for the most part. I have received feedback from many other REACT members in support of this position. They agree that a return to group licensing, at least for REACT Teams, would benefit the local communities by allowing REACT

to divert the funds which would have been required for licensing each individual member, to more worthy community support issues.

A return to limited group licensing would foster a controlled growth in the GMRS and encourage more available repeaters on a local basis. It is normally too expensive for individuals to place their own repeater in operation, and when they do, often conflict with other individuals forcing use of PL Tones to coordinate and prevent overlapping signals. REACT affiliated GMRS repeater systems are typically open to the general public and indeed the general public is welcomed to utilize them on a transient basis.

I support the suggestion that 501(c)(3) groups continue to receive favorable treatment from the FCC regarding licensing rates. Allowing REACT and other groups such as the American Red Cross and Salvation Army to become licensed as a group, will encourage local individuals to become involved in disaster and public safety communications.

I support the suggestion of Mr. Tom Currie about focusing new group licenses on the frequencies of 462.600, 462.675, 467.600 and 467.675 MHz. Most REACT teams now monitor 462.675 for emergency traffic, just as we have been doing for many, many years on CB Radio Channel 9. Placing the public service disaster and emergency organizations on these same frequencies is consistent and appropriate.

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A handwritten signature in black ink, appearing to read "Lee W. Besing". The signature is fluid and cursive, with the first name "Lee" and last name "Besing" clearly distinguishable.